

# **EXHIBIT G**

**Frontier Amended 30B6 NOD**

1 Timothy R. Titolo, Esq.  
2 Nevada Bar No. 003617  
3 TITOLO LAW OFFICE  
4 9950 West Cheyenne Ave.  
5 Las Vegas, Nevada 89129  
6 (702) 869-5100  
7 tim@titololaw.com

8 John D. McKay, Esq.  
9 *Admitted pro hac vice*  
10 PARK AVENUE LAW LLC  
11 127 W. Fairbanks Ave. No. 519  
12 Winter Park, Florida 32789  
13 (800) 391-3654  
14 johndmckayatty@gmail.com

15 *Attorneys for Plaintiffs PETER DELVECCHIA and*  
16 *A.D., a Minor*

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

PETER DELVECCHIA, *et al.*,

Plaintiffs,

vs.

FRONTIER AIRLINES, INC., *et al.*,

Defendants.

**Case No: 2:19-CV-01322-KJD-NJK**

**PLAINTIFFS' AMENDED NOTICE OF  
DEPOSITION OF DEFENDANT  
FRONTIER AIRLINES, INC.  
PURSUANT TO FED. R. CIV. P.  
30(b)(6)**

PLEASE TAKE NOTICE that the undersigned attorney for Plaintiffs, Peter DelVecchia individually and as next friend of A.D., a minor, will take the deposition of the company named herein, pursuant to Fed. R. Civ. P. 30(b)(6), at the time and place specified below, upon oral examination before a Notary Public or other person authorized to administer oaths, to be recorded by

PLAINTIFFS' AMENDED NOTICE OF DEPOSITION OF DEFENDANT  
FRONTIER AIRLINES, INC.

stenographic and audiovisual means, for discovery and use as evidence, and for all other purposes permitted by the Federal Rules of Civil Procedure. The deposition will continue from day to day until completed. The particular details are:

**Deponent: FRONTIER AIRLINES, INC.**

**Dates:** February 6-7, 2020

**Time:** 10:00 a.m. MST on February 6; 9:00 a.m. on February 7

**Place: Esquire Deposition Solutions  
600 17<sup>th</sup> Street  
Suite 2800 South  
Denver, CO 80202**

Pursuant to Fed. R. Civ. P. 30(b)(6), the deponent party (hereinafter “Frontier”) must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on its behalf, to testify on the following list of subjects. The persons designated must testify about information known or reasonably available to the organization.

## SUBJECT LIST

1. Any and all training given by Frontier to Flight Attendants Anna Bond, Chelsie Bright (Sakurada), Amanda Nickel and/or Scott Warren (hereinafter the “Subject Flight Attendants”) on the topic of passengers engaged in, or suspected to be engaged in, human trafficking.
2. Any and all training given by Frontier to the Subject Flight Attendants on the topic of passengers engaged in, or suspected to be engaged in, sex trafficking.
3. Any and all training given by Frontier to the Subject Flight Attendants on the subject of sexual misconduct by passengers against other passengers.
4. Any and all training given by Frontier to the Subject Flight Attendants on the subject of child abuse and/or child molestation by passengers against other passengers.

- 1 5. Any and all training given by Frontier to the Subject Flight Attendants on the subject of racial  
2 profiling as it relates to Flight Attendant interactions with passengers.
- 3 6. Any and all training given by Frontier to the Subject Flight Attendants on the subject of racial  
4 discrimination as it relates to Flight Attendant interactions with passengers.
- 5 7. Any and all training given by Frontier to pilots Rex Shupe and/or Shawn Mullin (hereinafter  
6 the "Subject Pilots") on the topic of passengers engaged in, or suspected to be engaged in,  
7 human trafficking.
- 8 8. Any and all training given by Frontier to the Subject Pilots on the topic of passengers engaged  
9 in, or suspected to be engaged in, sex trafficking.
- 10 9. Any and all training given by Frontier to the Subject Pilots on the subject of sexual  
11 misconduct by passengers against other passengers.
- 12 10. Any and all training given by Frontier to the Subject Pilots on the subject of child abuse  
13 and/or child molestation by passengers against other passengers.
- 14 11. Any and all training given by Frontier to the Subject Pilots on the subject of racial profiling as  
15 it relates to interactions with passengers.
- 16 12. Any and all training given by Frontier to the Subject Pilots on the subject of racial  
17 discrimination as it relates to interactions with passengers.
- 18 13. The contents of any written policies of Frontier on the subjects of: (a) human trafficking; (b)  
19 sex trafficking; (c) sexual misconduct by passengers against other passengers; (d) child abuse  
20 and/or child molestation by passengers against other passengers; (e) racial profiling as it  
21 relates to interactions with passengers; and (f) racial discrimination as it relates to interactions  
22 with passengers, as well as the dates of creation of such policies, the manner in which the  
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1 policies are made known to Frontier employees, and the circumstances surrounding their  
2 creation.

3 14. The contents of Frontier's Flight Attendant Manual ("FAM") that mention any of the  
4 following subjects: (a) human trafficking; (b) sex trafficking; (c) sexual misconduct by  
5 passengers against other passengers; (d) child abuse and/or child molestation by passengers  
6 against other passengers; (e) racial profiling as it relates to interactions with passengers; and  
7 (f) racial discrimination as it relates to interactions with passengers; or (g) the classification of  
8 passengers as Threat Levels One and/or Two, and procedures to be followed upon making  
9 such classification(s).  
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11 15. The contents of Frontier's Flight Operations Manual ("FOM") that mention any of the  
12 following subjects: (a) human trafficking; (b) sex trafficking; (c) sexual misconduct by  
13 passengers against other passengers; (d) child abuse and/or child molestation by passengers  
14 against other passengers; (e) racial profiling as it relates to interactions with passengers; and  
15 (f) racial discrimination as it relates to interactions with passengers; or (g) the classification of  
16 passengers as Threat Levels One and/or Two, and procedures to be followed upon making  
17 such classification(s).  
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19 16. The process(es) by which Frontier determines that information in its FOM and FAM, as well  
20 as other written materials, constitute "Sensitive Security Information" ("SSI") and are labeled  
21 by Frontier as such.  
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23 17. Frontier's current net worth.  
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25 18. All information known to Frontier about the Subject Flight Attendants and the Subject Pilots,  
26 regardless of whether or not documents containing such information has already been  
27 produced, and including, without limitation, the contents of their employee files labeled  
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1 “Confidential/EEOC,” “Confidential/Investigations,” and “Recruitment/Flight Attendant  
2 Hired,” as well as any information concerning demerits, warnings (including, without  
3 limitation, documented verbal warnings or DVWs), adverse employment actions, demotions,  
4 investigations, and/or demerit points accumulated for each of the Subject Flight Attendants  
5 and Subject Pilots.  
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7 19. All information known to employee Matthew Anderson, Customer Relations Advocate,  
8 concerning the events on Frontier Flight 2067 between KRDU and KLAS on March 28, 2019  
9 involving Plaintiffs.

10 20. The contents of all Skyspeed comments concerning the events on Frontier Flight 2067  
11 between KRDU and KLAS on March 28, 2019 involving Plaintiffs.  
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13 21. The identity and contact information of the “Able Bodied Passenger” selected by Flight  
14 Attendant Scott Warren to sit in the aisle seat on the row where Plaintiff A.D. was required to  
15 sit after being separated from his father on Flight 2067.  
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17 22. The identities and contact information on all male passengers who were traveling alone on  
18 Frontier Flight 2067 between KRDU and KLAS on March 28, 2019.

19 23. Any and all information obtained by Frontier or its agents that confirms or supports Plaintiffs’  
20 allegation that Flight Attendant Scott Warren struck Plaintiff Peter DelVecchia.

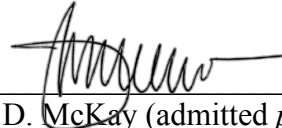
21 24. Any and all information obtained by Frontier or its agents that confirms or supports Plaintiffs’  
22 allegation that Flight Attendant Scott Warren sexually assaulted Plaintiff A.D.  
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24 25. All facts known to Frontier about Frontier’s creation and publication of “Inflight Must Read”  
25 Number 19-13 dated March 15, 2019 on the subject of “Sexual Misconduct.”

26 26. All facts known to Frontier about Frontier’s creation and publication of Revision 63 to  
27 Frontier’s FAM dated 04/01/19 titled “20.50 Human Trafficking.”  
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- 1 27. All facts known to Frontier about any and all incidents occurring between January 1, 2009  
2 and the date of the deposition, in which human trafficking aboard a Frontier flight was alleged  
3 or witnessed by anyone.
- 4 28. All facts known to Frontier about any and all incidents occurring between January 1, 2009  
5 and the date of the deposition, in which sex trafficking aboard a Frontier flight was alleged or  
6 witnessed by anyone.
- 7 29. All facts known to Frontier about any and all incidents occurring between January 1, 2009  
8 and the date of the deposition, in which sexual misconduct by a passenger against another  
9 passenger aboard a Frontier flight was alleged or witnessed by anyone.
- 10 30. All facts known to Frontier about any and all incidents occurring between January 1, 2009  
11 and the date of the deposition, in which child abuse and/or child molestation by a passenger  
12 against another passenger aboard a Frontier flight was alleged or witnessed by anyone.
- 13 31. All facts known to Frontier about any and all incidents occurring between January 1, 2009  
14 and the date of the deposition, in which racial discrimination or racial profiling aboard a  
15 Frontier flight was alleged or witnessed by anyone.
- 16 32. All facts known to Frontier about any and all incidents occurring between January 1, 2009  
17 and the date of the deposition, in which a passenger aboard a Frontier flight was classified by  
18 any Flight Attendant or Pilot as a Threat Level One or a Threat Level Two, and the  
19 procedures followed in such events.
- 20 33. All facts known to Frontier about any and all incidents occurring between January 1, 2009  
21 and the date of the deposition, in which any Frontier employee physically struck a passenger  
22 or another Frontier employee aboard a Frontier flight, and any and all responses by Frontier's  
23 management to such incidents.
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DATED this 10<sup>th</sup> day of January, 2020.



John D. McKay (admitted *pro hac vice*)  
PARK AVENUE LAW LLC  
127 W. Fairbanks Ave., No. 519  
Winter Park, FL 32789  
johndmckayatty@gmail.com  
(800) 391-3654

Timothy R. Titolo (Nev. Bar. No. 3617)  
TITOLO LAW OFFICE  
9950 West Cheyenne Avenue  
Las Vegas, Nevada 89129  
(702) 869-5100  
tim@titololaw.com

***Attorneys for Plaintiffs Peter DelVecchia  
And A.D., a Minor***



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 10, 2020, pursuant to prior agreement of counsel permitting electronic service by email, I served the foregoing Notice of Deposition on counsel for Defendants by email addressed to the following persons:

Brian T. Maye, Esq.  
Tara Shelke, Esq.  
ADLER MURPHY & McQUILLEN LLP  
20 South Clark Street, Suite 2500  
Chicago, Illinois 60603  
Email: bmaye@amm-law.com  
tshelke@amm-law.com

Charles A. Michalek, Esq.  
ROGERS, MASTRANGELO, CARVALHO & MITCHELL  
700 South Third Street  
Las Vegas, Nevada 89101  
Email: cmichalek@rmcmlaw.com



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